

WAVES OF CHANGE

NAVIGATING THE
FUTURE OF WATER

APRIL 22-25, 2025
PALM SPRINGS

AC.CWEA.ORG

WDR Compliance Best Practices

James Fischer, PE
Richard Cunningham
Sam Rose
Chris Ewers, PE





1.INTRO & REVIEW 2.SSMP BEST PRACTICES 3.CONCLUSIONS

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1. INTRO & REVIEW

2. SSMP BEST PRACTICES

3. CONCLUSIONS

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How this Training Helps



1. Expedite
compliance

2. Avoid Common
Violations

3. Reduce
Enforcement/Fines

5. Best Practice
Tips

4. Prepare for an
inspection!

How this Training Helps







Figure 7: Failure section of the pipe



What Has Changed?

Reissued WDR (2022-0103-DWQ)

- Builds on 2006 Order requirements
- Updates 16-year-old 2006 Order
- Incorporates Water Code Authorities
- Defines expectations/emphasizes protection of Water of the State (including surface waters and groundwater)
- Addresses resiliency/climate change impacts
- Clarifies enforceability of Order with CIWQS + failure to report/certify
- More explicit requirements
- All-in-One document





1.INTRO & REVIEW

What Has Changed?

Examples	2006 WDR	2022 WDR	Changes/Increase
Length	~40+ pages with MRP	~85+ pages including MRP	>50%
Enforcement	Minimal citations	Numerous citations	Substantial (Water Code 13327)
"Procedures"	11	25	>50%
"Shall"	55	123	>50%
Training	Very few mentions	Requires knowing Order, practice drills, competency, vol. estimation, etc.	Substantial (LRO, Spec. 5.1) (O/M, Att. D-4.3)



ELEMENT 1: Goal & Intro

Attachment D-1 (Goal/Intro), Specifications 5.2 (Develop/Implement Sewer System Management Plan)

ELEMENT 2: Organization

Attachment D-2 (Org), Specifications 5.1 (Designation of LRO)

ELEMENT 3: Legal Authority

Attachment D-3 (Legal Authority)

ELEMENT 4: Operations and Maintenance Program

Attachment D-4 (O/M), Specifications: 5.7 (Necessary Resources), 5.19 (Proper O/M)

ELEMENT 5: Design and Performance Provisions

Attachment D-5 (Design/Performance)

ELEMENT 6: Spill Emergency Response Plan

Attachment D-6 (Spill Emergency Response Plan), Specifications 5.12 (SERP/Remedial Actions)

Attachment E-1 (Notification, Monitoring, Reporting, Recordkeeping)

ELEMENT 7: Sewer Pipe Blockage Control Program

Attachment D-7 (Pipe Blockage Control Program)

ELEMENT 8: System Evaluation, Capacity Assurance, Capital Improvements

Attachment D-8 (System Evaluation, Capacity Assurance, Capital Improvements)

Specifications 5.6 (System Resilience)

Specifications 5.10 (System Capacity)

ELEMENT 9: Monitoring, Measurement, Program Modifications

Attachment D-9 (Monitoring, Measurement, Program Modifications)

Specifications: 5.11 (System Performance Analysis)

ELEMENT 10: Internal Audits

Attachment D-10 (Internal Audits)

ELEMENT 11: Communication

Attachment D-11 (Communication Program)



Address ALL requirements!



Reissued WDR Compliance Checklist (2024-2026)



1.INTRO & REVIEW

DEADLINES

Target Date	Due Date	Action Items (CY2024-2025)	Completion Date
Jan 2024	Due FEB 1, 2024	Cat 4 / Non-Cat 1 Laterals Spills (<50 gallons)	<input type="checkbox"/> _____
March 2024	Due APRIL 1, 2024	SERP (review/update prior to completing Annual Report)	<input type="checkbox"/> _____
March 2024	Due APRIL 1, 2024	Annual Report (draft/final/ upload by LRO)	<input type="checkbox"/> _____
May 2024	Due JUNE 5, 2024	SERP (annual review/assess effectiveness/update)	<input type="checkbox"/> _____
2024	Check SWRCB Website with WDID	SSMP 3-Year Audit (initiate audit/draft report)	<input type="checkbox"/> _____
2024/2025	Check SWRCB Website with WDID	SSMP 3-Year Audit (final report/certify/upload by LRO)	<input type="checkbox"/> _____
2025/2026	Check SWRCB Website with WDID	2025 SSMP Update (initiate review/draft new SSMP)	<input type="checkbox"/> _____
2025/2026	Check SWRCB Website with WDID	2025 SSMP Update (final report/certify/upload by LRO)	<input type="checkbox"/> _____
Jan 2025	Due FEB 1, 2025	Cat 4 / non-Cat 1 Laterals Spills (<50 gallons)	<input type="checkbox"/> _____
March 2025	Due APRIL 1, 2025	SERP (review/update prior to completing Annual Report)	<input type="checkbox"/> _____
March 2025	Due APRIL 1 2025	Annual Report (draft/final/ upload by LRO)	<input type="checkbox"/> _____
May 2025	Due JUNE 5, 2025	SERP Annual Review/assess effectiveness/update	<input type="checkbox"/> _____



SAMPLE SCHED.

Sewer System Management Plan & Audit Required Due Dates Transition from General Order 2006-0003-DWQ to Reissued General Order

Search by Waste Discharge Identification (WDID) Number

Enter your Waste Discharge Identification (WDID) number in the search field to retrieve the required Sewer System Management Plan (SSMP) Update and Audit due dates for your system.

Sewer System Management Plan & Subsequent Update Due Dates					
System Name	WDID Number	Original Plan Required Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Required Plan Update Due Date*
West Valley Sd CS	2SSO10217	5/2/2009	5/2/2014	5/2/2019	5/2/2025

Audit Due Dates								
System Name	WDID Number	Original Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	End of Required 3-Year Audit Period**
West Valley Sd CS	2SSO10217	5/2/2011	5/2/2013	5/2/2015	5/2/2017	5/2/2019	5/2/2021	5/2/2024

* Per Section 5.5 and Attachment E1, Section 3.11 of the General Order, Plan updates are due within six years after the required due date of the Enrollee's last Plan Update.

** Per Section 5.4 and Attachment E1, Section 3.10 of the General Order, the Audit Report is due within six months after the end of the required 3-year audit period.



1.2. SSMP Update Schedule

WDR REQUIREMENTS

[Att. D-1.2 \(pg. D-3\)](#)

"The Plan Introduction section must include a schedule for the Enrollee to update the Plan, including the schedule for conducting internal audits. The schedule must include milestones for incorporation of activities addressing prevention of sewer spills."

COMPLIANCE

The District utilizes the State Water Board's online lookup tool for ensuring all required due dates for updating its SSMP and completing its required SSMP Audits (see chart below).

Sewer System Management Plan & Subsequent Update Due Dates					
System Name	WDID Number	Original Plan Required Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Required Plan Update Due Date*
West Valley Sd CS	2SSO10217	5/2/2009	5/2/2014	5/2/2019	5/2/2025

Audit Due Dates								
System Name	WDID Number	Original Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	End of Required 3-Year Audit Period**
West Valley Sd CS	2SSO10217	5/2/2011	5/2/2013	5/2/2015	5/2/2017	5/2/2019	5/2/2021	5/2/2024

The District's most recent SSMP audit was for the period May 2021 through May 2024.

Notable maintenance milestones include optimization of preventative measures including transitioning from a 15-year CCTV inspection cycle to an 8-year cycle, maintaining a 36-month gravity main cleaning cycle, weekly pump station inspections, and capital improvement projects, all of which are monitored continuously throughout the 6-year SSMP update cycle.

EFFECTIVENESS

Key Performance Indicators:

1. Are SSMP Audits and SSMP Updates being performed as scheduled?
2. Has the Sewer System Management Plan been approved by the governing board on schedule (every six years)?
3. Are specific internally established sewer program milestones being monitored?

1.INTRO & REVIEW

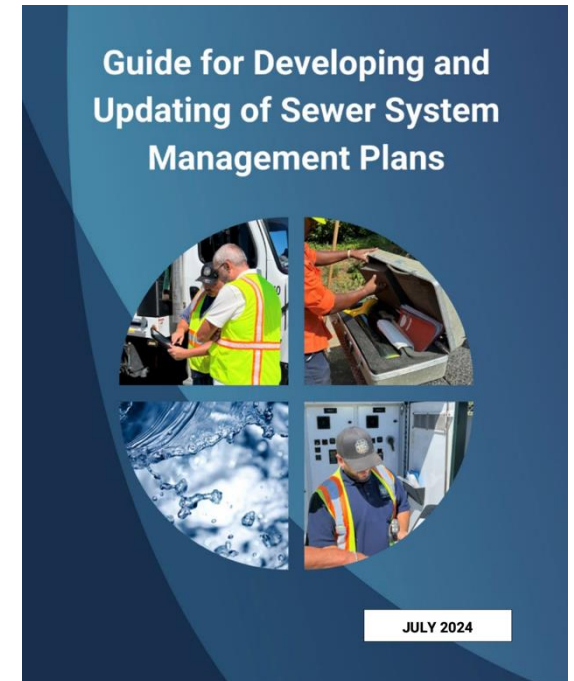


c. BACWA 2024 Development Guide

SSMP Guidance Manual (2024)

1. What Has Changed
2. How to Comply

1.INTRO & REVIEW



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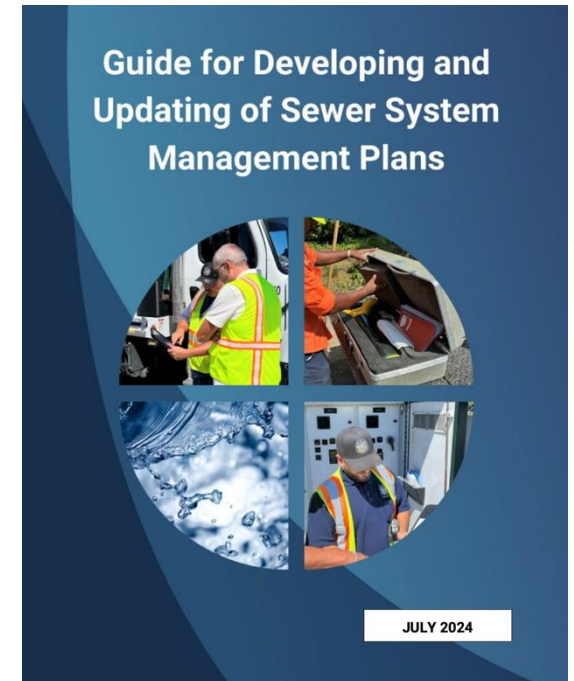


c. BACWA 2024 Development Guide

Development Team

- Mary Cousins, P.E. (BACWA Technical Manager)
- Guidance Manual Development Team:
 - James Fischer (Fischer Compliance LLC)
 - Sam Rose (Sam Rose Consulting)
 - Richard Cunningham (Utility Software LLC)
 - Paul Causey (Causey Consulting)

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1.INTRO & REVIEW

Distribution





Home | Water Issues | Programs | Sanitary Sewer Systems General Order


Sanitary Sewer Systems General Order

Sewage is untreated or partially treated domestic, municipal, commercial and/or industrial waste (including sewage sludge), and any mixture of these wastes with inflow or infiltration of stormwater or groundwater, conveyed in a sanitary sewer system. A spill is a discharge of sewage from any portion of a sanitary sewer system due to a sanitary sewer system spill, operational failure, and/or infrastructure failure. Sewage and its associated wastewater spilled from a sanitary sewer system may threaten public health, beneficial uses of waters of the State, and the environment.


General Order Information

To provide a consistent, statewide regulatory approach to address sanitary sewer spills, the State Water Board adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2022-0103-DWQ (Sanitary Sewer Systems General Order) on December 6, 2022. The Sanitary Sewer Systems General Order requires public agencies that own or operate sanitary sewer systems to develop and implement sewer system management plans and report all sanitary sewer spills to the State Water Board's online California Integrated Water Quality System (CIWQS) Sanitary Sewer System Database.


- Statewide Sanitary Sewer Systems General Order – Effective June 5, 2023

**Subscribe to our Email Lists**

- Subscribe to our email lists under the "Water Quality" topics.

**Contacts**

General Inquiries:


 SanitarySewer@waterboards.ca.gov

General Order Compliance Tools

How to Develop and Upload Sewer System Management Plan

- SSMP Development Guidance Manual (Prepared by BACWA)
- Guidance: SSMP Upload and Certification


Guide for Developing and Updating of Sewer System Management Plans



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HOME | ABOUT | MEETINGS | BACWA COMMITTEES | EDUCATION | BACWA MEMBERS | NUTRIENTS | CONTACT US

WHO WE ARE

BACWA is a joint powers agency, formed under the California Government Code by the five largest wastewater treatment agencies in the San Francisco Bay Area. Our members include the many municipalities and special districts that provide sanitary sewer services to more than 7 million people. BACWA is dedicated to working with our members, state and federal regulatory agencies, and non-governmental organizations to improve and enhance the San Francisco Bay environment. We provide technical expertise, financial support, and a public utility perspective to ensure that regulations affecting our members are well-informed, thoughtful and effective.

[17 ALL ANNOUNCEMENTS](#)[11 ALL DOCUMENTS](#)[10 VIEW CALENDAR](#)



TABLE OF CONTENTS

Introduction and Frequently Asked Questions 1

 Is the Manual a Guidance Document or Is It an Enforcement Tool? 1

 What are the differences with 2006 and 2022 Waste Discharge Requirements? 1

 What Do Agencies Need to Do to Help Stay in Compliance?..... 1

 Why Was the Manual Developed? 1

 What Size Sewer Agency Is the Manual Intended For? 2

 Why Do Collection System Managers and Operators Need the Manual? 2

 How Was the Manual Developed?..... 2

 What Does the Manual Do? 2

 What Doesn't the Manual Do? 3

 Strategies and Where to Start 3

 Document Structure 4

 Regulatory Background..... 5

 Background..... 7

Element 1 – Goal And Introduction..... 11

 1.1. Regulatory Context 11

 1.2. Sewer System Management Plan Update Schedule 14

 1.3. Sewer System Asset Overview..... 15

 Supplemental Guidance – Element 1..... 16

Element 2 – Organization 18

 Supplemental Guidance – Element 2..... 20

Element 3 – Legal Authority..... 21

 Supplemental Guidance – Element 3..... 22

Element 4 – Operations and Maintenance Program 23

 4.1 Updated Map of Sewer System 23

 4.2 Preventive Operation and Maintenance Activities..... 25

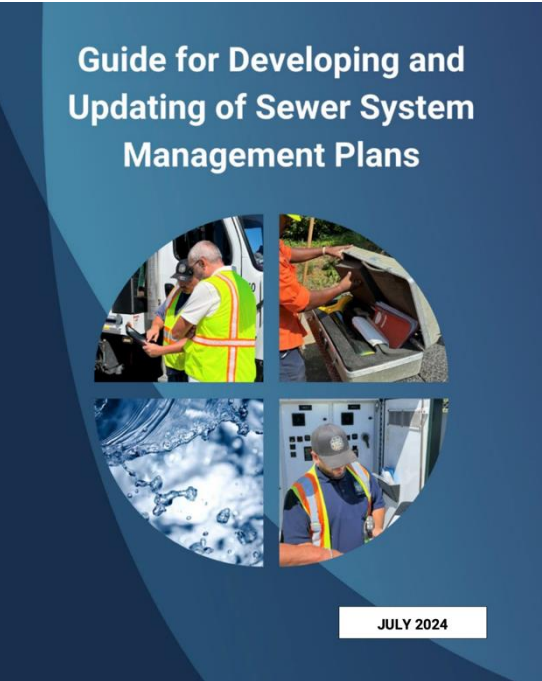
 4.3 Training..... 27

 4.4 Equipment Inventory..... 29

 Supplemental Information – Element 4..... 31



1.INTRO & REVIEW



Element 5 – Design and Performance Provisions	32
5.1 Updated Design Criteria and Construction Standards	32
5.2 Procedures and Standards.....	33
Supplemental Information – Element 5.....	34
Element 6 – Spill Emergency Response Plan.....	35
Supplemental Information - Element 6	38
Element 7 – Sewer Pipe Blockage Control Program	40
Supplemental Information – Element 7.....	43
Element 8 – System Evaluation, Capacity Assurance, Capital Improvements	44
8.1. System Evaluation and Condition Assessment.....	44
8.2. Capacity Assessment and Design Criteria.....	46
8.3. Prioritization of Corrective Actions	48
8.4 Capital Improvement Plan.....	49
Supplemental Information – Element 8.....	50
Element 9 – Monitoring, Measurement, Program Modifications	51
Supplemental Information – Element 9.....	53
Element 10 – Internal Audits	54
Supplemental Information – Element 10.....	56
Element 11 – Communication Program.....	57
Supplemental Information – Element 11.....	59

LIST OF APPENDICIES..... 60

- APPENDIX 1 – Key Regulatory Changes for Sewer System Management Plan Development
- APPENDIX 2 – Change Log/Annual Compliance Checklist
- APPENDIX 3 – State Water Board Staff Presentations on 2022 Waste Discharge Requirements
- APPENDIX 4 – 2015 Sewer System Management Plan Manual Summary
- APPENDIX 5 – Operations and Maintenance Program Supplement
- APPENDIX 6 – State Water Board Pre-Inspection Questionnaire (version 4)
- APPENDIX 7 – References and Common Industry Acronyms

1.INTRO & REVIEW

Guide for Developing and Updating of Sewer System Management Plans



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Introduction and Frequently Asked Questions

Is the Manual a Guidance Document or Is It an Enforcement Tool?

- This question was raised during the development of the manual because - like the Vehicle Code - the manual can be interpreted as both an educational tool as well as an enforcement device, depending on the end user's point-of-view and business purposes.

The authors and reviewers elected to adopt a style and tone in the language in the manual that stresses education and learning. This will help guide the end user towards achieving the Water Board's strategic goal of having agencies operate in a process of continuous improvement.

What are the differences with 2006 and 2022 Waste Discharge Requirements?

- Both Waste Discharge Requirements (WDRs) require all publicly-owned sewer agencies with >1 mile of sewer pipes to enroll for coverage. For a copy of the Order, visit the [enroll for regulatory coverage website](#).
- The 2022 WDR (referred to throughout this manual as the "Reissued WDR") has additional changes and new requirements.
- This manual focuses on the key requirements of the Reissued WDR to facilitate agencies in developing and updating their Sewer System Management Plans.
- A summary of the key differences between the 2006 and 2022 WDRs is provided in Appendix 1. In addition, Appendix 3 contains archived State Water Board staff presentations on the 2022 WDR that were developed in April 2023.

What Do Agencies Need to Do to Help Stay in Compliance?

- Visit the [State Water Board's Spill Reduction website](#) to stay current and review the all the latest regulatory compliance information.
- Attend – and document – staff completion of available industry training.
- Maintain a Sewer System Management Plan Change Log for documenting all agency Sewer System Management Plan modifications for the Reissued WDR (see Appendix 2).
- Review all key compliance deadlines for the Reissued WDR (see checklist included in Appendix 2 as an example) to help reduce agency violations for missing deadlines.

Why Was the Manual Developed?

- To provide a "blueprint" for assisting small/medium-sized collection system owners and operators to comply with the State Water Resources Control Board (SWRCB) General Reissued Waste Discharge Requirements for Sanitary Sewer Systems ("Reissued WDR", [Order No. 2022-0103-DWQ](#)).
- The Reissued WDR became effective on June 5, 2023 and replaced the 2006 WDR (Order No. 2006-003-DWQ and its Monitoring and Reporting Program, Order No. 2013-0058-EXEC).

1.INTRO & REVIEW

Guide for Developing and Updating of Sewer System Management Plans



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What Doesn't the Manual Do?

- Replace legal review/assurances or shielding of an agency against potential enforcement including Clean Water Act litigation.
- Substitute responsibility of an agency to complete/adopt a fully compliant Sewer System Management Plan.
- Provide a "One Size Fits All" document or checklist substitute.

Strategies and Where to Start

Key strategies for making the best use of the Manual include:

- Have a clear understanding of the overall concepts/changes to the Revised WDR.
The Revised WDR contains new requirements and expectations of agencies. Agencies must adapt to the Reissued WDR requirements.
- The manual's style has a step-by-step "How To Do It" approach, different than the 2015 version, which provided general guidance in narrative form.
- Put together a Sewer System Management Plan team made up of your agency's Operations and Engineering staff to get the best input into the document. Both Operations and Engineering have WDR requirements to fulfill that cross over disciplines.



Photo Credits: Rosamond Community Services District, City of Roseville, West Bay Sanitary District

1.INTRO & REVIEW

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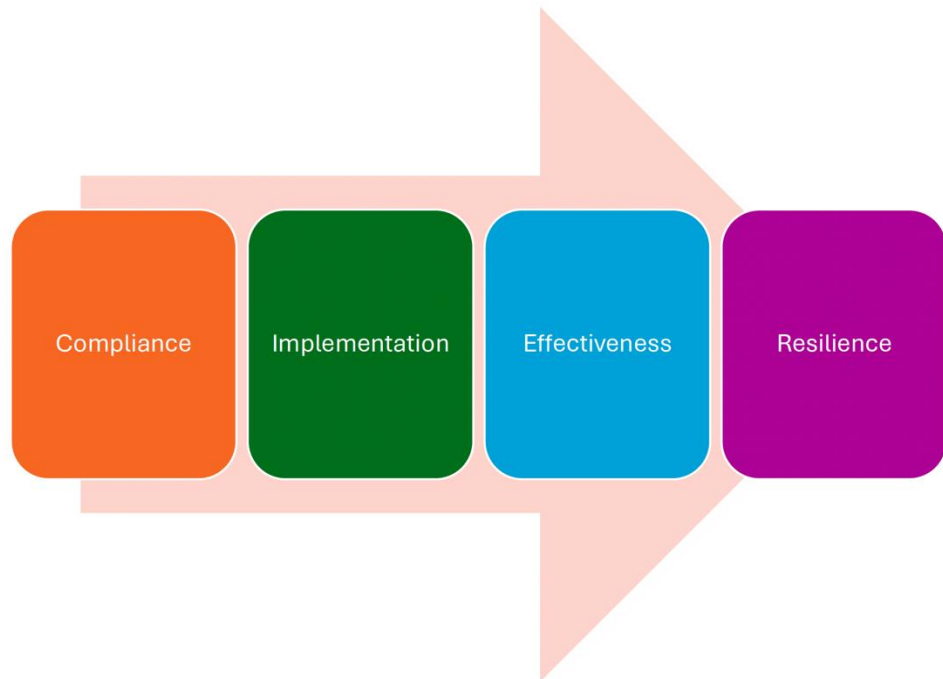
Document Structure

The information in this User manual is divided into multiple sections that correspond to the WDR requirements in Attachment D, Sewer System Management Plan-Required Elements.

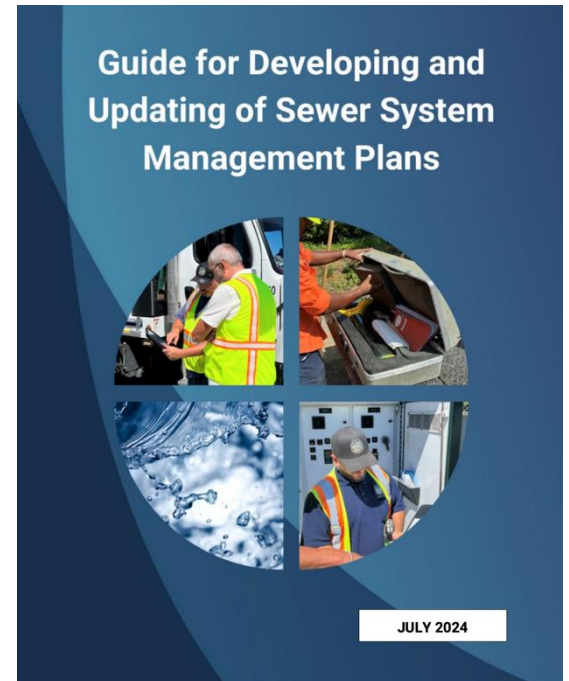
Each element discussed in the manual is broken into the following sections:

- Requirements – concise description summarizing applicable WDR requirements.
- Compliance – guidance for helping agency demonstrate compliance.
- Implementation – guidance for supporting actions to be performed/developed to meet compliance of main/sub-elements.
- Effectiveness – guidance for utilizing Key Performance Indicators for measuring targets, showing how agency plans and processes are working and how effective they are for achieving desired results.
- Resilience – guidance to further bolstering programs to avoid violations, reduce spills, and sustain scrutiny by outside regulators.
- Common Violations – typical noncompliance issues identified during Sewer System Management Plan audits.

Figure 1 – Visualization for Sewer System Management Plan Compliance, Implementation, Effectiveness, and Resilience



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The Water Board requires that the Sewer System Management Plan be evaluated for compliance, implementation and effectiveness while addressing system resilience. To properly manage the Sewer System Management Plan, these concepts must be considered when developing each element. **Set yourself up for success.**

Compliance is the act of meeting regulations. This is the starting point for Sewer System Management Plan development, as all the requirements in the individual elements must be incorporated and addressed. As agencies begin to develop their new Sewer System Management Plan, there will be cases where new procedures, work plans, and ordinances will need to be developed or updated to meet the requirements. Compliance is the most fundamental aspect in the development of the Sewer System Management Plan. As a reminder, Attachment D specifies *“The Enrollee’s development, update, and implementation of a Sewer System Management Plan addressing the requirements of this Attachment is an enforceable component of this General Order.”*



1.INTRO & REVIEW

Guide for Developing and Updating of Sewer System Management Plans



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Implementation is the actions or steps taken to accomplish tasks, goals, and objectives. There needs to be a plan and schedule to carry out these actions. A plan without a goal is just a wish and a plan that is not implemented is just an idea. To implement a plan, a goal, level of effort, resources, and timeline need to be determined.

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Effectiveness is the degree to which something is successful in producing a desired result. There must be a procedure or method to measure effectiveness so the degree to which something is effective can be determined. A requirement of an internal audit (Element 10) is to measure the effectiveness of each Sewer System Management Plan element.

1.INTRO & REVIEW

Guide for Developing and Updating of Sewer System Management Plans



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Effectiveness is the degree to which something is successful in producing a desired result. There must be a procedure or method to measure effectiveness so the degree to which something is effective can be determined. A requirement of an internal audit (Element 10) is to measure the effectiveness of each Sewer System Management Plan element.

A Key Performance Indicator (KPI) is a measurable target that indicates how plans and processes are working in terms of obtaining desired results. KPIs provide focus for strategic and operational improvements, create an analytical basis for decision making, and help place attention on what matters most.

Key Performance Indicator example:

Goal: Develop a hydraulic model that determines pipe capacity requirements for current system and future (a 30-year buildout is used here strictly for this example).

Examples of Key Performance Indicators:

- Number of capacity-related spills or surcharge conditions during the period?
- Has the system responded to rain events as indicated by the hydraulic model?
- Have there been any changes to zoning designations (residential, commercial, industrial)?
- Rain event trends: Have there been changes in rain event occurrences, intensity, and duration?
- Water conservation: Do change(s) require modifications to our model assumptions?

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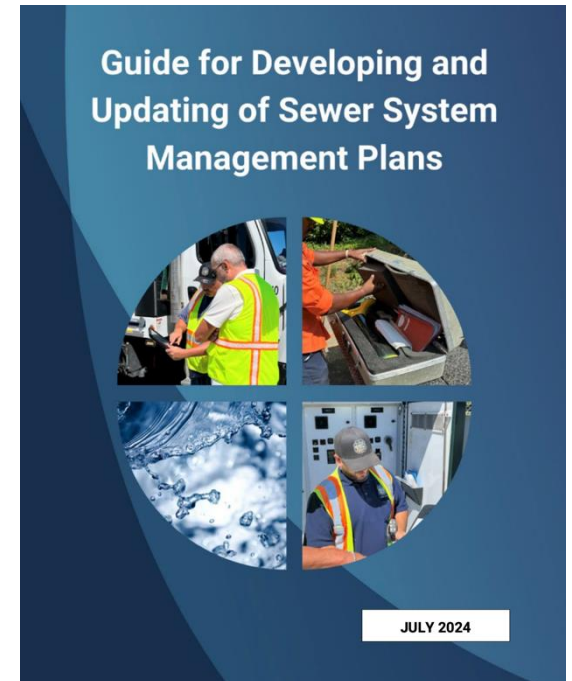
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Supplemental Guidance – Element 1

RESILIENCE

To provide resilience for this element, an agency should consider identifying or developing resilience indicators, such as:

- Standard operating procedure to provide guidance when collecting and managing asset data.
- QA/QC process to ensure information is correct, calendar dates/deadlines for reminders to avoid missing deadlines or violating WDR requirements.
- Training for all appropriate agency staff to ensure more than one staff member can collect and manage data.



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Supplemental Guidance – Element 1

In addition to the above guidance, an agency should also consider addressing the following related “Specifications” requirements in the Reissued WDR:

- Specifications 5.2 (pages 18-19): “Sewer System Management Plan Development and Implementation”
- Specifications 5.7 (page 22): “Allocation of Resources”
- Provisions 6.1 (pages 27-35): “Enforcement Provisions”
- Provisions 6.3 (page 31): “Sewer System Management Plan Availability”

ADDITIONAL GUIDANCE

- See Appendix 4

COMMON WDR VIOLATIONS

To help reduce potential violations for noncompliance, an agency should avoid the following common violations:

- ✓ Failure to identify appropriate goals.
- ✓ Failure to establish necessary funding, staffing, capital resources for sewer program.
- ✓ Failure to update Sewer System Management Plan sub-elements.
- ✓ Failure to maintain Sewer System Management Plan Change Log.
- ✓ Failure to establish process to ensure public has access/input to Sewer System Management Plan
- ✓ Failure to complete appropriate Sewer System Management Plan audits.
- ✓ Failure to measure effectiveness and progress.
- ✓ Failure to develop and implement procedures for updating sewer maps.
- ✓ Failure to provide appropriate narrative descriptions describing procedures for prioritization of system repairs and maintenance to prevent spills.
- ✓ Failure to describe technologies and practices to reduce spills.

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Figure 2 – Sewer System Management Plan Requirements (Reissued WDR)

ELEMENT 1: Goal & Intro

- Attachment D, Section 1 (Goal/Intro), Specifications 5.2 (Develop/Implement Sewer System Management Plan)

ELEMENT 2: Organization

- Attachment D, Section 2 (Org.), Specifications: 5.1 (Designation of LRO and Data Submitter(s))

ELEMENT 3: Legal Authority

- Attachment D, Section 3 (Legal Authority)

ELEMENT 4: Operations and Maintenance Program

- Attachment D, Section 4 (O/M, Training/Drills), Specifications: 5.7 (Necessary Resources), 5.19 (Proper O/M)

ELEMENT 5: Design and Performance Provisions

- Attachment D, Section 5 (Design/Performance)

ELEMENT 6: Spill Emergency Response Plan

- Attachment D, Section 6 (Spill Emergency Response Plan), Specifications 5.12 (SERP/Remedial Actions)
- Attachment E-1 (Notification, Monitoring, Reporting, Recordkeeping)

ELEMENT 7: Sewer Pipe Blockage Control Program

- Attachment D, Section 7 (Pipe Blockage Control Program)

ELEMENT 8: System Evaluation, Capacity Assurance, Capital Improvements

- Attachment D, Section 8 (System Evaluation, Capacity Assurance, Capital Improvements)
- Specifications 5.6 (System Resilience)
- Specifications 5.10 (System Capacity)

ELEMENT 9: Monitoring, Measurement, Program Modifications

- Attachment D, Section 9 (Monitoring, Measurement, Program Modifications)
- Specifications 5.11 (System Performance Analysis)

ELEMENT 10: Internal Audits

- Attachment D, Section 10 (Internal Audits)

ELEMENT 11: Communication

- Attachment D, Section 11 (Communication Program)

pg. 6

Guide for Developing and Updating of Sewer System Management Plans



JUNE 2024

REVIEW CHECKLIST

2006 WDR (rescinded)	2022 WDR (current)	2022 Changes	Key 2022 Changes for SSMP Development/Updates
1. Goal Provision D.13(i)	1. Goal and Introduction Att. D-6, Spec. 5.2	Many	<ul style="list-style-type: none">• Implementation of SSMP as “living document”• Enforcement of development, update, and implementation• Narratives for regulatory context, assets, updated sewer map(s)

1.INTRO & REVIEW

2006 WDR (rescinded)	2022 WDR (current)	2022 Changes	Key 2022 Changes for SSMP Development/Updates
1. Goal Provision D.13(i)	1. Goal and Introduction Att. D-6, Spec. 5.2	Many	<ul style="list-style-type: none"> • Implementation of SSMP as “living document” • Enforcement of development, update, and implementation • Narratives for regulatory context, assets, updated sewer map(s)
2. Organization Provision D.13(ii)	2. Organization Attachment D-6	Few	<ul style="list-style-type: none"> • Name of Legally Responsible Official

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4. O/M Program Provision D.13 (iv)	4. O/M Program Attachment D-6	Many	<ul style="list-style-type: none"> • Procedures for maintaining/providing Water Board access to sewer map(s) • Enhanced training on WDR, drills/skilled volume estimations, CIWQS reporting • Scheduling system enhancements for problem/root-prone areas

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5. Design and Performance Provisions Provision D.13 (v)	5. Design and Performance Provisions Attachment D-6	Few	<ul style="list-style-type: none"> • Few
6. Overflow Emergency Response Plan Provision D.13 (vi)	6. Spill Emergency Response Plan Attachment D-6	Many	<ul style="list-style-type: none"> • Staff/contractor requirements for implementation, removing/cleaning sewage from drainage conveyance systems not impacting beneficial uses/receiving waters • Coordination/collaboration with storm drain agencies (prior, during, after) spills • Post-spill assessments, annual assessment, implement containment tech/practices

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7. Fats, Oils, and Grease Control Program Provision D.13 (vii)	7. Sewer Pipe Blockage Control Program Attachment D-6	Few	<ul style="list-style-type: none"> • Plan/schedule for pipe-blocking substances • Commercial controls/authority to inspect, “hot spot” program, source controls

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8. System Evaluation and Capacity Assurance Plan Provision D.13 (viii)	8. System Evaluation, Capacity Assurance, and Capital Improvements Attachment D-6	Many	<ul style="list-style-type: none"> Implementation of capital improvements Identify/justify and prioritize specific system areas (high env. consequences/areas, new surface waters, steep terrain, high groundwater, near surface waters), exfiltration, recordkeeping enhancements, assets vulnerable to climate impacts. More information for capacity assessments, inspections, audits Capacity of flood-prone systems subject to inflow/infiltration Increases in erosive forces, pumping redundancy, prioritization of corrective actions Enhanced coordination (operations/maintenance/engineering, other utilities)

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9. Monitoring, Measurement, and Program Modifications Provision D.13 (ix)	9. Monitoring, Measurement, and Program Modifications Attachment D-6	Few	<ul style="list-style-type: none"> Adaptive management/implementation effectiveness (Key Performance Indicators) Update plan procedures/activities based on monitoring/performance evaluations.

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10. Sewer System Management Plan Program Audits	10. Internal Audits Attachment D-6	Few	<ul style="list-style-type: none"> SSMP Audits must be completed every 3 years (vs. every 2 years under previous WDR) and certified and uploaded by the Legally Responsible Official to CIWQS.

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11. Communication Program	11. Communication Program	Few	<ul style="list-style-type: none"> Enhanced communications procedures (public/owners/operators connected to sewers)

Appendix 1 (Key Regulatory Changes for Sewer System Management Plan Development/Updates)



2006 WDR (rescinded)	2022 WDR (current)	# of Changes	Key 2022 Changes for SSMP Development/Updates
Legally Responsible Official	Designation of LRO Spec. 5.1 (pg. 18)	Major	<ul style="list-style-type: none"> Legally Responsible Official must have authority to ensure compliance, authority over management of the entire sewer system, and authorized to make managerial decisions governing operations, capital improvements, and ensuring long-term environmental compliance. Legally Responsible Official must possess recognized degree/certificate for O/O of sewer systems and/or professional training and experience demonstrated through extensive knowledge, training, and experience

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Certification of System Management Plan + Updates Provision D.14 (pg. 15)	Certification of SSMP and Updates Spec. 5.3 (pg. 19)	Major	<ul style="list-style-type: none"> Legally Responsible Official must certify/upload SSMPs to CIWQS.

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SSMP Internal Audits Provision D.13(x) (pg. 14)	SSMP Development and Update Spec. 5.4 (pgs. 19-20)	Minor	<ul style="list-style-type: none"> Agencies must conduct Audits of their SSMPs including implementation <u>every 3 years</u> (vs. every 2 years under 2006 WDR). Within 6 months after the end of the required 3- year Audit period, the agency Legally Responsible Official shall submit the Audit report into the online CIWQS database per requirements of section 3.10 of Attachment E1 of the Reissued WDR). Audit reports will only be viewable publicly in CIWQS by Water Board staff. Audits must : 1) be sized/scaled to system, 2) evaluate implementation and effectiveness of SSMP in preventing spills, 3) identify necessary modifications to SSMP for correcting deficiencies, and 4) include a proposed schedule for correcting deficiencies.

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SSMP Updates Provision D.14 (pg. 15)	Six-Year SSMP Update Spec. 5.5 (pgs. 21)	Minor	<ul style="list-style-type: none"> Agencies must update their SSMPs and include a summary of revisions based on Audit findings <u>every 6 years</u> (vs. every 5 years under 2006 WDR).

Appendix 1 (Key Regulatory Changes for Sewer System Management Plan Development/Updates)



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N/A	System Resilience Spec 5.6 (pg. 22)	N/A	<ul style="list-style-type: none"> Agencies must include and implement system-specific procedures to proactively prioritize O/M, condition assessments, and repair/rehabilitation.



1.INTRO & REVIEW 2.SSMP BEST PRACTICES 3.CONCLUSIONS

WAVES OF CHANGE

NAVIGATING THE
FUTURE OF WATER

APRIL 22-25, 2025
PALM SPRINGS

AC.CWEA.ORG

COMPLIANCE CHECKLIST



ELEMENT 1: Goal & Intro

- Attachment D, Section 1(Goal/Intro), Specifications 5.2 (Develop/Implement Sewer System Management Plan)

Expected (help for managers):

- How to showcase agency goals
- Document work programs
- Document changes to demonstrate improvements to system
- MEASURING EFFECTIVENESS
- RESILIENCE

Unexpected (violations for managers to avoid):

- Failure to establish goals, dedicate system resources, funding
- Failure to describe system/unique attributes
- Failure to conduct timely quality SSMP audits that measure SSMP effectiveness (compliance checks are much easier to do and what is typically done)
- Failure to provide specific repair, rehabilitation, capital resources and program descriptions and schedules



COMMENTS & SUGGESTIONS

ELEMENT 1: Goal & Intro

- Attachment D, Section 1 (Goal/Intro), Specifications 5.2 (Develop/Implement Sewer System Management Plan)

COMMENTS:

- Extremely long document for anyone to review and demonstrate City compliance

SUGGESTIONS:

- Imbed a new Change Log to the first page
- Add new intro letter from lead author(s) describing what has changed to introduce to board to ensure smooth review (see example of ours below)
- Showcase SSMP organization up front
- Add more narrative on compliance (see our example below)
- Add CS performance summary and SWRCB deadlines from CIWQS (see our example below)
- Add photos throughout especially with staff in them to customize/personalize content
- Any unique challenges to describe? Add in Element
- Add unique SSMP responsibility table/contacts (see our example below)



We are pleased to present the new 2025 Sewer System Management Plan (SSMP) Update developed in partnership with the Garden Grove Sanitary District or City management. The 2025 Update meets and exceeds compliance with the Reissued WDR (State Water Board, Water Quality Order No. 2022-0103-DWQ, Attachment D-10 and Specifications 5.4). The 2025 SSMP has been completely revised to harmonize with industry standard guidelines and incorporates the latest SSMP Audit findings.

The 2025 SSMP is a declaration of what the City is doing to demonstrate full compliance with the Reissued WDR. Attachment A of the Reissued WDR (page A-4), states “A sewer system management plan is a living document which requires the City to Enrollee develops and implements to effectively manage its sanitary sewer system(s) in accordance with this General Order.” This requires the City to periodically review and update the SSMP as necessary until its next required 6-year SSMP Update is completed.

We look forward to assisting the City wherever necessary to fully implementation its new 2025 SSMP Update.

Sincerely,

James Fischer, P.E.

Principal, Fischer Compliance LLC

Credentialed U.S. EPA NPDES Compliance Inspector

COMMENTS & SUGGESTIONS



2.SSMP BEST PRACTICES

SEARCH CRITERIA: [\[REFINE SEARCH\]](#) [\[NEW SEARCH\]](#) [\[GLOSSARY\]](#)

WDID (10574)

Date Range: Start_Date (04/01/2020) End_Date (04/01/2025)

DRILLDOWN HISTORY: [\[GO BACK TO LISTING OF COLLECTION SYSTEMS\]](#)

Garden Grove City CS

Agency: Garden Grove Sanitary District

General Information

Region	Place ID	Place Name	CS Category	Place Address	Place County
8	256400	Garden Grove City CS	Municipal(Public)	13802 Newhope Garden Grove CA 92843	Orange

Collection System Spill Summary

Operational Indices: Garden Grove City CS

Spill Rate Index (spills/100mi/yr)							
	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Garden Grove City CS	0.06	N/A	0.0	0.0	0.0	0.72	0.0
State Municipal(Public) Average	1.7	N/A	0.99	0.91	1.5	2.36	0.46
Region Municipal Average	0.32	N/A	0.1	0.4	0.68	0.57	0.38

Net Volume Spills Index (gallons/1000 Capita/yr)							
	Category 1			Category 2		Category 3	
	Main System	Laterals	Other	Main System	Other	Main System	Other
Garden Grove City CS	0.07	N/A	0.0	0.0	0.0	0.0	0.0
State Municipal(Public) Average	3568.5	N/A	2001.2	170.74	1274.98	47.87	16.65
Region Municipal Average	72.1	N/A	24.18	30.68	103.7	1.12	0.1

COMMENTS & SUGGESTIONS

Sewer System Management Plan & Audit Required Due Dates Transition from General Order 2006-0003-DWQ to Reissued General Order

Search by Waste Discharge Identification (WDID) Number

Enter your Waste Discharge Identification (WDID) number in the search field to retrieve the required Sewer System Management Plan (SSMP) Update and Audit due dates for your system.

Sewer System Management Plan & Subsequent Update Due Dates					
System Name	WDID Number	Original Plan Required Due Date	Required Plan Update Due Date	Required Plan Update Due Date	Required Plan Update Due Date*
Garden Grove City CS	8SSO10574	5/2/2009	5/2/2014	5/2/2019	5/2/2025

Audit Due Dates								
System Name	WDID Number	Original Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	Required Plan Audit Due Date	End of Required 3-Year Audit Period**
Garden Grove City CS	8SSO10574	5/2/2011	5/2/2013	5/2/2015	5/2/2017	5/2/2019	5/2/2021	5/2/2024

* Per Section 5.5 and Attachment E1, Section 3.11 of the General Order, Plan updates are due within six years after the required due date of the Enrollee's last Plan Update.

** Per Section 5.4 and Attachment E1, Section 3.10 of the General Order, the Audit Report is due within six months after the end of the required 3-year audit period.

COMMENTS & SUGGESTIONS



COMMENTS & SUGGESTIONS

The City is committed to fully implementing the WDR¹⁴ which includes addressing all requirements by integrating a wide range of programs specifically designed for ensuring the integrity and efficiency of the City's sanitary sewer collection system. Moreover, the City is dedicated to maintaining its collection system in a systematic manner by implementing various work programs, with a focus on critical areas, to prevent spills, allowing for a comprehensive approach to maintenance. Work programs include CCTV inspections, pipe cleaning, manhole inspections, lift station maintenance, root control, source control and pipe repair, just to name a few. Work programs are described in more detail in sections Specifications 5.19 Operation and Maintenance of this SSMP.

By prioritizing proactive measures and taking a comprehensive approach, the City is well-equipped with a proven track record of effectively operating its sanitary sewer collection system with the highest levels of service, complying with the WDR, and reducing/eliminating sewage spills.



COMPLIANCE CHECKLIST

ELEMENT 2: Organization

- Attachment D, Section 2 (Org.), Specifications. 5.1 (Designation of LRO and Data Submitter(s))

Expected (help for managers):

- Showcase agency staffing, lines of authority, and specific responsibilities for SSMP compliance and implementation
- MEASURING EFFECTIVENESS
- RESILIENCE

Unexpected (violations for managers to avoid):

- Failure to establish specific staffing and resources for SSMP
- Failure to measure effectiveness (changes to improve, processes/procedures to implement SSMP)
- Failure to test/update chain of communication for spills



COMMENTS & SUGGESTIONS

ELEMENT 2: Organization

- Attachment D, Section 2 (Org.), Specifications. 5.1 (Designation of LRO and Data Submitter(s))

COMMENTS:

- Good organization

SUGGESTIONS:

- Improve SSMP responsibilities/contact info (see example below)
- Improve chain of communication procedures description (see below)



2.1. Organizational Lines of Authority

2.SSMP BEST PRACTICES

Task	Board of Directors/ District Manager	Water Services Manager	Sanitation Supervisor	Public Works Foreman	Field Crews
SSMP Development Plan and Schedule	Reviews, Approves				
Legal Authority	Reviews, Approves	Oversees			
Final SSMP Document	Reviews, Approves	Oversees			
Sewer Funding Plan	Reviews, Approves	Oversees			
Goals of SSMP	Implements	Oversees			
Organization of SSMP	Reviews, Approves	Oversees	Participates		
Up to Date Map of Collection System, Pumping Facilities, and Stormwater Conveyances		Oversees	Participates	Participates	
System Evaluation and Capacity Assurance Plan		Oversees	Participates		
Sewer System Rehabilitation Plan		Participates	Oversees	Participates	
FOG Outreach		Participates	Oversees	Participates	
Plan for FOG Disposal		Participates	Oversees	Participates	
FOG Source Control Measures		Participates	Oversees	Participates	
Design and Construction Standards		Oversees	Participates		
Procedures and Standards for Inspection and Testing		Oversees	Participates	Participates	
SSMP Monitoring		Participates	Participates	Participates	
SSMP Internal Audits		Oversees	Participates	Participates	
SSMP Program Updates			Participates	Participates	
SSMP Communication Program		Oversees			
Overflow Emergency Response Plan			Oversees	Participates	Implements
Operation and Maintenance Program		Participates	Oversees	Participates	Implements
CCTV Inspection and Condition Assessment			Oversees	Participates	
SSO Trend Maintenance			Oversees	Participates	
Staff Training Program			Oversees	Participates	
Equipment Inventory			Oversees	Participates	
Sanitary Sewer Overflows			Reports		
CIP Plans, Specifications, and Estimate Standards		Oversees			
Construction Management and Inspection Staff Work		Directs			

COMMENTS & SUGGESTIONS



2.3. Chain of Communication for Reporting Spills

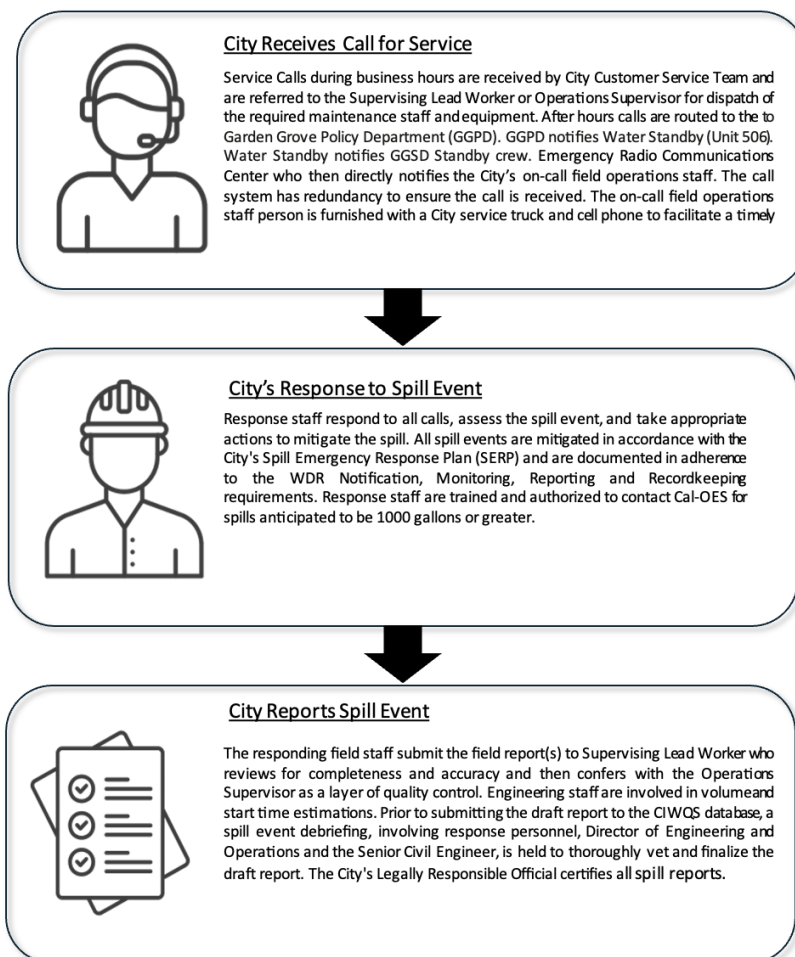


Figure 2-3 – Chain of Communication for Reporting Spills

COMMENTS & SUGGESTIONS

COMPLIANCE CHECKLIST



ELEMENT 3: Legal Authority

- Attachment D, Section 3 (Legal Authority)

Expected (help for managers):

- Reviewing/monitoring related applicable agency codes, standards, agreements for deficiencies
- MEMEASURING EFFECTIVENESS
- RESILIENCE

Unexpected (violations for managers to avoid):

- Failure to review/edit/update appropriate codes, standards, agreements to ensure desired outcomes
- Failure to ensure necessary legal authority for easements, ensuring adequate access for cleanup/operations/maintenance

COMMENTS & SUGGESTIONS



ELEMENT 3: Legal Authority

- Attachment D, Section 3 (Legal Authority)

COMPLIANCE CHECKLIST



ELEMENT 4: Operations and Maintenance Program

- Attachment D, Section 4 (O/M, Training/Drills), Specifications: 5.7 (Necessary Resources), 5.19 (Proper O/M)

Expected (help for managers):

- Updating/availability of maps
- Procedures for updating maps
- CMMS/monitoring for overdue/incomplete tasks, issues
- Training, competency checks for field staff
- Equipment/critical parts inventory
- MEASURING EFFECTIVENESS
- RESILIENCE

Unexpected (violations for managers to avoid):

- Failure to establish procedures to update maps, implement O/M program (CCTV, cleaning)
- Lack of training program/documentation
- Failure to identify all critical spare/backup supplies and parts
- Failure to adapt O/M program based on actual experience/results

COMMENTS & SUGGESTIONS



ELEMENT 4: Operations and Maintenance Program

- Attachment D, Section 4 (O/M, Training/Drills), Specifications: 5.7 (Necessary Resources), 5.19 (Proper O/M)

COMPLIANCE CHECKLIST



ELEMENT 5: Design and Performance Provisions

- Attachment D, Section 5 (Design/Performance)

Expected (help for managers):

- Current/updated agency standards
- Warranty inspections on new assets
- MEASURING EFFECTIVENESS
- RESILIENCE

Unexpected (violations for managers to avoid):

- Failure to establish, maintain, sewer standards and procedures for inspections and testing
- Failure to enforce instances of noncompliance
- Failure to track/document deviations from standards

COMMENTS & SUGGESTIONS



ELEMENT 5: Design and Performance Provisions

- Attachment D, Section 5 (Design/Performance)

COMPLIANCE CHECKLIST



ELEMENT 6: Spill Emergency Response Plan

- Attachment D, Section 6 (Spill Emergency Response Plan), Specifications 5.12 (SERP/Remedial Actions)
- Attachment E-1 (Notification, Monitoring, Reporting, Recordkeeping)

Expected (help for managers):

- Customized emergency planning and coordination (before/during/after spills, emergency preparedness posture, response, mitigation)
- Testing the plan
- Training on the plan
- MEASURING EFFECTIVENESS
- RESILIENCE

Unexpected (violations for managers to avoid):

- Failure to establish the plan
- Failure to TEST, TRAIN, and USE plan
- Failure to notify
- Failure to recover sewage, cleanup storm drains

COMMENTS & SUGGESTIONS



ELEMENT 6: Spill Emergency Response Plan

- Attachment D, Section 6 (Spill Emergency Response Plan), Specifications 5.12 (SERP/Remedial Actions)
- Attachment E-1 (Notification, Monitoring, Reporting, Recordkeeping)

COMPLIANCE CHECKLIST



ELEMENT 7: Sewer Pipe Blockage Control Program

- Attachment D, Section 7 (Pipe Blockage Control Program)

Expected (help for managers):

- Ensure program addresses system-specific defects
- Schedules
- Monitoring
- Enforcing requirements
- MEASURING EFFECTIVENESS
- RESILIENCE

Unexpected (violations for managers to avoid):

- Failure to ID system issues/needs for program
- Failure to implement necessary enforcement for FSE noncompliance
- Failure to establish public outreach program

COMMENTS & SUGGESTIONS



ELEMENT 7: Sewer Pipe Blockage Control Program

- Attachment D, Section 7 (Pipe Blockage Control Program)

COMPLIANCE CHECKLIST



ELEMENT 8: System Evaluation, Capacity Assurance, Capital Improvements

- Attachment D, Section 8 (System Evaluation, Capacity Assurance, Capital Improvements)
- Specifications 5.6 (System Resilience)
- Specifications 5.10 (System Capacity)

Expected (help for managers):

- Condition assessment – “how to” (evaluate past performance, maintenance/repairs, age of system, etc.)
- Capacity assessment – “how to”
- Capital Plan – “how to”
- MEASURING EFFECTIVENESS
- RESILIENCE

Unexpected (violations for managers to avoid):

- Failure to develop and implement requirements
- Failure to ID sections vulnerable to collapse, failure, blockages, capacity, etc.
- Failure to develop AND implement Capital Improvement Program
- Other guidance

COMMENTS & SUGGESTIONS



ELEMENT 8: System Evaluation, Capacity Assurance, Capital Improvements

- Attachment D, Section 8 (System Evaluation, Capacity Assurance, Capital Improvements)
- Specifications 5.6 (System Resilience)
- Specifications 5.10 (System Capacity)

COMPLIANCE CHECKLIST



ELEMENT 9: Monitoring, Measurement, Program Modifications

- Attachment D, Section 9 (Monitoring, Measurement, Program Modifications)
- Specifications 5.11 (System Performance Analysis)

Expected:

- Adaptive management best practices and processes (“how to”)
- MEASURING EFFECTIVENESS
- RESILIENCE

Unexpected:

- Failure to maintain required data for program assessments
- Failure to modify/change SSMP as necessary
- Failure to document changes in CHANGE LOG

COMMENTS & SUGGESTIONS



ELEMENT 9: Monitoring, Measurement, Program Modifications

- Attachment D, Section 9 (Monitoring, Measurement, Program Modifications)
- Specifications 5.11 (System Performance Analysis)

COMPLIANCE CHECKLIST



ELEMENT 10: Internal Audits

- Attachment D, Section 10 (Internal Audits)

Expected:

- SSMP Auditing procedures
- MEASURING EFFECTIVENESS
- RESILIENCE

Unexpected:

- Failure to complete SSMP Audits as required
- Failure to MEASURE EFFECTIVENESS (not just compliance status) – early style checklist formats still largely in use do not meet standards

COMMENTS & SUGGESTIONS



ELEMENT 10: Internal Audits

- Attachment D, Section 10 (Internal Audits)

COMPLIANCE CHECKLIST



ELEMENT 11: Communication

- Attachment D, Section 11 (Communication Program)

Expected:

- External/satellite communications
- Public opportunities to comment

Unexpected:

- Failure to communicate with satellites
- Failure to establish public process for input on SSMP

COMMENTS & SUGGESTIONS



ELEMENT 11: Communication

- Attachment D, Section 11 (Communication Program)

Example Work Products

- Annual Report
- Spill Emergency Response Plan (SERP) – COMPLIANCE WHEEL HANDOUT
- SSMP Audit
- SSMP Update
- Spill Documentation
- Standard Operating Procedure (SOP)
- Pump Station Emergency Response Plan (ERP)



Example Work Products

2.SSMP BEST PRACTICES

- Annual Report

L	M	N	O	P	Q
3SSO10332	3SSO10332	3SSO10332	3SSO10332	3SSO10332	3SSO10332
3	3	3	3	3	3
Active	Active	Active	Active	Active	Active
005/2019 2:05:30.000000	2/2020 1:58:36.000000	0/2021 11:05:49.000000	1/2022 7:15:37.000000	2/15/2022 9:49:15.000000 AM	3/6/23
Municipal (Public)	Municipal (Public)	Municipal (Public)	Municipal (Public)	Municipal (Public)	Municipal (Public)
44,513	45,742	46,454	47,374	47,374	46,451
11,100,796	11,561,091	13,138,249	13,829,626	13,829,626	15,430,493
7,496,523	13,298,196	19,056,599	13,706,786	13,706,786	15,967,800
2	1	1	2	2	3
8	8	8	9	9	9
1	1	1	1	1	1
1	1	1	1	1	1
7	8	8	7	7	7
0	0	0	0	0	0
1	1	2	2	2	2
0	0	0	0	0	0
0	0	0	0	0	0
1	1	1	1	1	0
1	1	1	0	0	0
0	0	0	0	0	0
0	0	0	0	0	0
0	0	1	1	1	1
0	0	0	0	0	0
3	4	4	4	4	3
0	0	0	0	0	0
36	36	36	36	36	36
40	40	40	40	40	100
18	18	18	18	18	40

Example Work Products

2.SSMP BEST PRACTICES

- Spill Emergency Response Plan (SERP) – Compliance Tool Handout

No.	WDR	SERP Key Performance Indicators (KPIs)	Evaluation Frequency	Annual Success Rate (%)
COMPLIANCE POINT #1				
1.1	5.7	Annual Emergency Response Operations Expenditures vs. Budget Amount	Annual	
COMPLIANCE POINT #2				
2.1	5.12	SERP Certified in Annual Report is Up to Date	Annual	
2.2	5.12	Annual Review/Assessment of SERP Completed by Required Due Date	Annual	
2.3	5.12	SERP Modifications Documented in Change Log	Each Modification	
2.4	5.12	Spill Volume Recovered and Properly Disposed vs. Total Volume Spilled	Annual	
2.5	ATT D-6	Cat. 1 Spills Prevented Due to Containment Operations vs. all Cat. 1 spills	Annual	
2.6	ATT D-6	Spill Volume Recovered from Drainage Conveyance Systems (DCS) vs. total volume entering DCS	Annual	
2.7	5.13	Response Time Goals Met (Response = Receipt of Call to operator arrival)	Annual	
COMPLIANCE POINT #3				
3.1	5.13	Field Records Match Data Input into CIWQS (each Report)	Annual	
3.2	ATT D-6	Outside Agencies and Internal Contacts Up to Date	Annual	
3.3	ATT D-6	Cat. 1 Spills Requiring Water Quality Monitoring Sampled w/in 18 hours	Each Event	
3.4	ATT D-6	Compliance with Regulatory Reporting and Notification Deadlines	Annual	
3.5	ATT D-6	Field Data Collection Forms Verified for Completeness and Accuracy	Each Event	
3.6	ATT D-6	Spill Notifications from the Public and Remote Sites Functioned as Intended	Annual	

Example Work Products

- Spill Emergency Response Plan (SERP) – Compliance Tool Handout



SPILL EMERGENCY RESPONSE PLAN (SERP)

UPDATE (MAY 2024)



PART 1 (COMPLIANCE GUIDE)

COMPLIANCE POINT #1.....	8
COMPLIANCE POINT #2-1.....	9
COMPLIANCE POINT #2-2.....	10
COMPLIANCE POINT #2-3.....	11
COMPLIANCE POINT #3.....	12
COMPLIANCE POINT #4.....	13
COMPLIANCE POINT #5-1.....	14
COMPLIANCE POINT #5-2.....	15
COMPLIANCE POINTS #6-1	15
COMPLIANCE POINT #6-2.....	16
COMPLIANCE POINT #6-3.....	16
COMPLIANCE POINT #6-4.....	17
COMPLIANCE POINT #6-5.....	17



















PART 2 (FIELD GUIDE)

LIST OF TABLES

Table 1 - Summary of Applicable Spill Emergency Response Plan Requirements.....	6
Table 2 – City spill data and compliance benchmarks	7

Example Work Products

- SSMP Audit

SSMP AUDIT FINDINGS						
This section provides a high-level summary of the SSMP Audit findings (see Tables 1 and 2 below) for incorporation into the Agency's 2025 SSMP Update <u>due on or before 8/2/2025</u> . The summary provides quick-reference details to all key Audit findings for management and staff to facilitate implementation for addressing all identified violations and areas of concern with the Reissued WDR.						
Table 1 - Summary of Agency SSMP Audit Findings (Reissued WDR, ATTACHMENTS)						
SSMP AUDIT FINDINGS (ATTACHMENTS)						
WDR Reqs.	Best Practices?	Violations?		Areas of Concern?		Audit References
Att. D-1		1		2		0 See Element 1 Analysis/Findings and Appendix 1
Att. D-2		0		0		1 See Element 2 Analysis/Findings and Appendix 1
Att. D-3		0		0		1 See Element 3 Analysis/Findings and Appendix 1
Att. D-4		2		0		9 See Element 4 Analysis/Findings and Appendix 1
Att. D-5		0		0		0 None
Att. D-6		1		1		1 See Element 6 Analysis/Findings and Appendix 1
Att. D-7		1		0		1 See Element 7 Analysis/Findings and Appendix 1
Att. D-8		0		0		4 See Element 8 Analysis/Findings and Appendix 1
Att. D-9		0		1		0 See Element 9 Analysis/Findings and Appendix 1
Att. D-10		0		1		0 See Element 10 Analysis/Findings and Appendix 1
Att. D-11		1		0		0 None
Att. E1		0		1		0 See E1 Analysis/Findings and Appendix 1
Totals		6		5		17 See all Elements and Appendix 1

All Elements SAMPLE

Example Work Products

- SSMP Update

1.1. Regulatory Context

Element 1 SAMPLE

WDR REQUIREMENTS

[Att. D-1.1 \(pg. D-2\)](#)

“The Plan Introduction section providing a general description of the local sewer system management program and discuss Plan implementation and updates”.

COMPLIANCE

The District is committed to fully implementing the WDR³ which includes addressing all requirements by integrating a wide range of programs specifically designed for ensuring the integrity and efficiency of the District’s sanitary sewer collection system. Moreover, the District is dedicated to maintaining its collection system in a systematic manner by implementing various work programs, with a focus on critical areas, to prevent spills, allowing for a comprehensive approach to maintenance. Work programs include CCTV inspections, pipe cleaning, manhole inspections, lift station maintenance, root control, source control and pipe repair, just to name a few. Work programs are described in more detail in the Specifications 5.19 Operation and Maintenance section of this SSMP.

By prioritizing proactive measures and taking a comprehensive approach, the District is well-equipped with a proven track record of effectively operating its sanitary sewer collection system with the highest levels of service, complying with the WDR, and reducing/eliminating sewage spills.

Example Work Products

- SSMP Update

IMPLEMENTATION PLAN/SCHEDULE

No.	Plan	Schedule	Responsible Party		
			Dir	Eng	Ops
1.2.1	Prepare for next SSMP Audit	Begin 5/2/2027	X	X	X
1.2.2	Complete and Upload SSMP audit.	By 11/2/2027	X	X	
1.2.3	Incorporate Audit Findings, update Change Log and Update SSMP	5/2/2031	X	X	
1.2.4	Board Approval and LRO Certification of SSMP	By 5/2/2031	X	X	

Element 1 SAMPLE

1.3. Sewer System Asset Overview

WDR REQUIREMENTS

[Att. D-1.3 \(pg. D-3\)](#)

"The Plan Introduction section must provide a description of the Enrollee-owned assets and service area, including but not limited to:

- a. Location, including county(ies).
- b. Service area boundary.
- c. Population and community served.
- d. System size, including total length in miles, length of gravity mainlines, length of pressurized (force) mains, and number of pump stations and siphons.
- e. Structures diverting stormwater to the sewer system.
- f. Data management systems.
- g. Sewer system ownership and operation responsibilities between Enrollee and private entities for upper and lower sewer laterals.
- h. Estimated number or percentage of residential, commercial, and industrial service connections; and
- i. Unique service boundary conditions and challenge(s).
- j. Additionally, the Plan Introduction section must provide reference to the Enrollee's up-to-date map of its sanitary sewer system, as required in section 4.1 (Updated Map of Sanitary Sewer System) of this Attachment."

COMPLIANCE

The District provides wastewater collection services to a 28.3- square mile service area that includes the Cities of Campbell and Monte Sereno; a portion of the City of Saratoga; the Town of Los Gatos; and the intervening unincorporated areas of Santa Clara County (See Figure 1, below), with a total population of 111,521. The District owns 9,471 gravity main segments totaling 415 miles (diameter range from 3 to 39 inch), approximately 29,100 laterals totaling 165 miles (diameter range 3 to 6 inch), three small pump stations, and 94 siphons.

The District does not have stormwater diversion structures.

Example Work Products

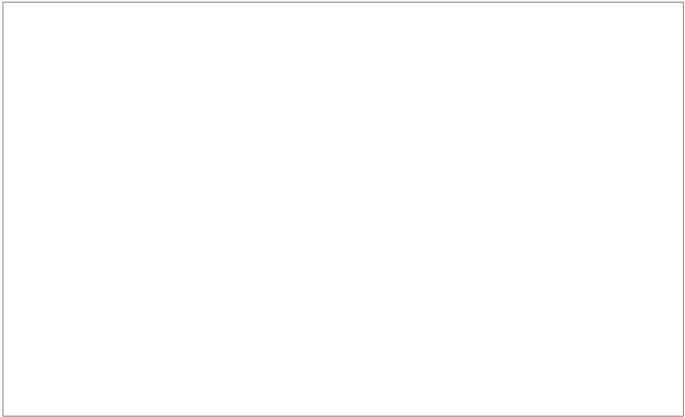
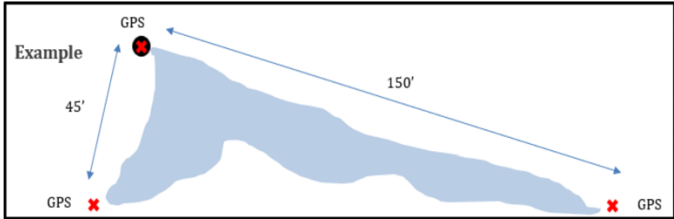
2.SSMP BEST PRACTICES




















- Spill Documentation

SPILL RESPONSE FIELD REPORT	
TABLE OF CONTENTS	
13.1	NOTIFICATION OF SPILL.....2
13.2	CALLER INTERVIEW2
13.3	RESPOND/ASSESS3
13.4	SPILL CATEGORY DETERMINATION3
13.5	CONTAINMENT LOCATION4
13.6	CONTAINMENT METHOD.....4
13.7	FAILURE LOCATION.....4
13.8	SPILL APPEARANCE POINT(S)5
13.9	RESTORE FLOW5
13.10	SPILL CAUSE5
13.11	SPILL RESPONSE ACTIVITIES6
13.12	FINAL SPILL DESTINATION6
13.13	IMPACT TO RECEIVING WATERS.....6
13.14	ESTIMATED TRAVEL TIME TO RECEIVING WATERS7
13.15	REQUIRED PHOTOS7
13.16	SPILL LOCATION AND SPREAD8
13.17	SPILL VOLUME ESTIMATIONS.....9
13.18	CLEANUP TIMELINE.....10
13.19	CLEAN UP METHOD:10
13.20	DISPOSAL OF RECOVERED SEWAGE.....10
13.21	REQUIRED PHOTOS.....10
13.22	RESPONSE COMPLETE.....11

ATT 1 - Spill Response Field Form v4Updated 10/26/2023Page 1 of 11

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SPILL RESPONSE FIELD REPORT	
13.16 SPILL LOCATION AND SPREAD (Pg. E1-5 Sec. 2.1)	
Sketch the footprint of the spill and provide dimensions (in feet) for size and extent of spill (use sketch area below). Include spill appearance point, spill destination(s), and indicate locations where GPS coordinates were taken.	
	
SPILL LOCATION AND SPREAD EXAMPLE	
	
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	ATT 1 - Spill Response Field Form v4.docx
	ATT 2 - Spill Start Time Estimation Worksheet.docx
	ATT 3 - Measured Volume Spill Estimation Worksheet v1.docx
	ATT 4 - Duration and Flow Rate Worksheet v2.docx
	ATT 5 - Upstream Connections Estimation Method Worksheet v3.docx
	ATT 6 - Eyeball Spill Volume Worksheet.docx
	ATT 7 - Measured Volume Soil Worksheet.docx
	ATT 8 - Measured Volume Soil Training Guide.pdf
	ATT 9 - Equivalents Conversions Formulas.docx
	ATT 10 - Cal-OES Contact Log v2.docx
	ATT 11 - Cat 1 50k Gallons Spill Assessment Checklist.docx
	ATT 12 - Failure Analysis and Corrective Actions.docx
	ATT 13 - Interview Script.docx
	ATT 14 - Cleaning Services Declination Waiver v3.docx
	ATT 15 - Sewer Spill Response Evaluation Worksheet v1.docx
	ATT 16 - Training Record v1.docx
	ATT 17 - Equipment Inventory and Critical Spare Parts v1.docx
	ATT 18 - Spill Response Requirements for Contracted Services.docx
	ATT 19 - Spill Trends and Response Workbook v3.xlsx

Example Work Products



- Standard Operating Procedure (SOP)

Lift Station Inspection & Function Check List

(The Monthly tasks are in addition to the Weekly tasks)

Lift Station Name: **Boyington**

LS-02

Complete Lift Station Log

Your Initials on the Log indicate you have completed the following steps.

Weekly Wet Well Inspection

- ☐ Check for cleanliness - debris or excessive grease buildup.
- ☐ Inspect Slide Rail and lifting chain/cable for corrosion, damage, etc.
- ☐ Inspect Discharge Piping for corrosion, leaks, damage, etc.
- ☐ Inspect for infiltration
- ☐ Inspect for Signs of High Water mark
- ☐ Inspect wet well walls for evidence of corrosion
- ☐ Inspect Hatch Cover/Access Door for
- ☐ Visually Inspect Flume for Obstructions
 - ☐ Damage
 - ☐ Hinges
 - ☐ Clasps or locking mechanism
 - ☐ Lift Assist or support mechanism

Monthly Wet Well Cleaning (perform first week of the month)

- ☐ Clean wet well using hydro-vac
 - ☐ Use high-pressure hand gun to clean
 - ☐ Pumps
 - ☐ Pump cables
 - ☐ Chains
 - ☐ Discharge piping

Weekly Pump Function Checks

Test pumps in HAND using TCU & HOA's (Watch water level drop)

- ☐ Test P1 Operation/Pump Down
- ☐ Test P2 Operation/Pump Down
- ☐ Check to see if Run Hours appear normal. (Run time should be similar for each pump)

Monthly Amp Check (perform first week of the month)

- ☐ to be performed if Run Hours differ greatly between pumps

Any item that cannot be completed while you are performing the above tasks shall be indicated to your supervisor using the Lucy Work Request module.

Example Work Products

2.SSMP BEST PRACTICES

- Pump Station Emergency Response Plan (ERP)

Santa Cruz County Sanitation District Pump Station Emergency Response Plan



Aptos-Esplanade PS
104 Marina Ave

SCCSD Pump Station ERP – Aptos Esplanade PS

Table of Contents

ERP Framework		Page
1	Pump Station Location & Directions	3
2	Hazards & Cautions	4
3	Overflow Decision Tree	5
4	Pump Station Power Map	12
5	Pump Station Network	13
6	Pump Station Piping	14
Action Items		Page
7	Spill Containment	15
8	Lockout/Tagout Procedures	16
9	Generator & Transfer Switch Operation	21
10	Portable Generator Operation via Transfer Switch	31
11	Portable Generator to Directly Power Pumps 2 or 3	35
12	Pump Station Bypass	40
13	Force Main Bypass	44
Supporting Information		Page
14	Pump Station Technical Information	46
15	Pump Station Control System Overview	47
16	Spill Notification Procedures	58
17	System Maps	61
18	Contact Information	63

Example Work Products



2.SSMP BEST PRACTICES

- Pump Station Emergency Response Plan (ERP)

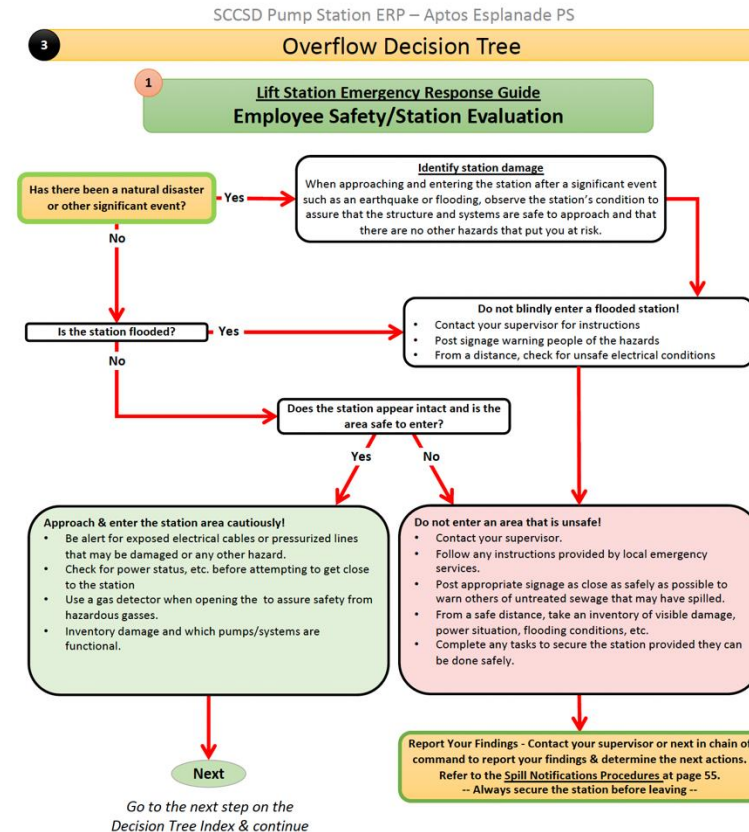
Santa Cruz County Sanitation District

Pump Station Emergency Response Plan



Aptos-Esplanade PS

104 Marina Ave



Legend Initial Question Action Step Out-of-Sequence Action Step Off-Page Action Sequence merge



1.INTRO & REVIEW 2.SSMP BEST PRACTICES 3.CONCLUSIONS

WAVES OF CHANGE

NAVIGATING THE
FUTURE OF WATER

APRIL 22-25, 2025
PALM SPRINGS

AC.CWEA.ORG



CONCLUSIONS

1. Be proactive (not reactive)
2. Know the WDR and SSMP Requirements!
3. Utilize Available Industry References (BACWA SSMP Guidance Manual)
4. Network with other agencies
5. Attend all available trainings!



Sanitary Sewer Systems New Waste Discharge Requirements for LRO's, Supervisors, and Managers

- ✓ **Expedite** agency compliance to avoid violations.
- ✓ **Reduce** risks for enforcement and fines.
- ✓ **Learn** Regional Board insights to get your program ready before inspectors arrive.
- ✓ **Learn** SSMP Auditing Best Practices for resilience with Regulators/NGOs.

+Bring your Current SSMP/Audits for expert compliance feedback!



Email: jim@fischercompliance.com | Phone: 916-606-5275

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2025 Workshops

For Legally Responsible Officials (LROs), Supervisors, Managers, and Data Submitters

- ✓ WASTEWATER COMPLIANCE & ENFORCEMENT TRAINING
- ✓ SEWER SYSTEM MANAGEMENT PLAN WORKSHOP

[LEARN MORE](#)



Compliance Redefined

FISCHER COMPLIANCE, LLC is a professional water and wastewater regulatory compliance consulting company, delivering high quality sanitary sewer systems compliance consulting services to public municipalities.

[FIND OUT HOW](#)

WASTEWATER COMPLIANCE TRAININGS *Workshops*

WASTEWATER COMPLIANCE & ENFORCEMENT TRAINING

These six-hour workshops are designed for managers, supervisors and operators of sanitary sewer/collections and wastewater treatment systems, as well as laboratory managers, and environmental compliance staff. With over 50 years of combined water quality and regional water board experience, Jim Fischer and Tamarin Austin will guide participants through numerous hands-on modules, resulting in a memorable training and strategies you can use to keep your system in compliance.



TOPICS INCLUDE

- NPDES Permit Compliance
- Enforcement Policy Review
- Public/NGO Clean Water Act Claims
- Compliance Guidance and Strategies
- Biosolids/Land Application
- Sanitary Sewer WDRs
- Water Board Resources

Training Contact Hours Provided

SEWER SYSTEM MANAGEMENT PLAN WORKSHOP

Sewer System Management Plans (SSMPs) deadlines are coming up! The large systems adoption deadline is May 2 and medium systems adoption deadline is August 2. Are you ready? We can help! These workshops are designed for collection system managers, supervisors, operators, engineers, environmental compliance staff and any staff responsible for SSMP development and implementation. We will review the Sanitary Sewer Waste Discharge Requirements, with specialized attention to development of SSMPs. Attendees will be exposed to numerous case studies and receive a customized SSMP questionnaire and workbook, giving your agency a head start on the required SSMP update.

SPACE IS LIMITED!

To Register or Explore Additional Dates,
Email: Tamarin.ACWAINC@gmail.com
www.AustinCleanWaterAdvisors.com

WORKSHOP DATES

COMPLIANCE & ENFORCEMENT TRAINING

- March 5 - Sacramento
- March 10 - East Bay
- March 17 - Los Angeles
- March 19 - Ventura County
- March 31 - Orange County
- April 3 - San Diego
- April 9 - San Francisco
- April 28 - Wine Country

James Fischer, P.E.

Tamarin Austin, JD



Water Board WDRs
Enforcement/Inspector
(Retired)



Water Board Lawyer
(Retired)



SSMP WORKSHOPS

- March 6 - Sacramento
- March 11 - East Bay
- March 18 - Los Angeles
- March 20 - Ventura County
- April 1 - Orange County
- April 4 - San Diego
- April 10 - San Francisco
- April 29 - Wine Country



Q & A

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WDR Compliance Best Practices

James Fischer, PE

(916) 606-5275 (jim@fischercompliance.com)

Richard Cunningham

(925) 297-9229 (rc@sewers.com)

Sam Rose

(916) 871-4495 (consultsamrose@gmail.com)

Chris Ewers, PE

(916) 521-9696 (chris@ewersengineering.com)

THANK YOU

PLEASE NOTE:

It will take 2-3 weeks after the event for your contact hours to appear in your account.